

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

UNITED STATES OF AMERICA

)

v.

) **Case: 2:17-CR-533-KOB-TMP**

DOUGLAS GLOVER

)

**DEFENDANT DOUGLAS GLOVER'S
OBJECTIONS TO THE PRESENTENCE REPORT**

Douglas Glover, through counsel and pursuant to Federal Rule Criminal Procedure 32(f)(1), submits the following clarifications to the Presentence Investigation Report (PSR):

1. **Paragraph 34** – Mr. Glover respectfully asserts that the base offense level should be 14 rather than 26 pursuant to U.S.S.G. § 2M5.2(a)(2)(B). This offense involved only the polymer magazines for AK-47 rifles, not the firearms themselves or the ammunition, but U.S.S.G. § 2M5.2(a) does not address offenses involving only magazines. When considering the guidelines as a whole, Mr. Glover submits that the offense falls most closely within § 2M5.2(a)(2)(B), which applies a base offense level of 14 for offenses involving ammunition for non-fully automatic rifles. AK-47 rifles may be semi-automatic rather than fully automatic, and Mr. Glover submits that the polymer magazine piece alone should be treated as ammunition.
2. **Paragraph 52** – Mr. Glover requests that this paragraph add a note that he denies the allegations in the pending case.

3. **Paragraph 55** – Mr. Glover notes that his father was recently released from the rehabilitation facility.
4. **Paragraph 80** – Mr. Glover asserts that his father, Douglas Kenneth Glover, purchased the Chevrolet truck and that it belongs to his father. Mr. Glover further notes that he was in custody at the time of the purchase.

Respectfully submitted,

KEVIN L. BUTLER
Federal Public Defender

/s/Allison Case
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CERTIFICATE OF SERVICE

I hereby certify that on February 6, 2019, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all parties.

/s/ Allison Case